

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
	§	CRIMINAL NO. 5:14-cr-00790-OLG
VS.	§	
	§	
MARK ANTHONY GRIMES	§	

**MOTION TO TEMPORARILY MODIFY CONDITIONS OF PRETRIAL RELEASE**

**TO THE HONORABLE JUDGE OF SAID COURT, UNITED STATES DISTRICT  
JUDGE FOR THE WESTERN DISTRICT OF TEXAS, SAN ANTONIO DIVISION:**

Now comes Defendant, MARK ANTHONY GRIMES, by and through his undersigned counsel, and respectfully moves this Honorable Court for an order allowing Mr. Grimes to have his GPS monitored tracking device removed for a period of time of eight (8) hours, beginning at 11:00 AM and ending at 7:00 PM on May 9, 2016.

I.

Mark Grimes is charged in a seven count indictment with possession and distribution of Child Pornography in violation of 18 U.S.C. § 2252A(a)(2) and 18 U.S.C. §2252A(a) (5)(B).

II.

He was released on bond on October 7, 2014, and has remained on bond through to the present time. His Pre Trial Services Officer is Ms. Norma Aranda. As a condition of bond, Mr. Grimes wears a GPS monitored tracking device.

III.

Mr. Grimes suffers from severe lower back pain which impacts his ability to do daily tasks. He is scheduled to undergo an MRI to help diagnose his back problems on May 9, 2016. The metal in Mr. Grimes' GPS will interfere with the MRI test.

IV.

Accordingly, Mr. Grimes asks this court for permission to have the GPS device removed for eight (8) hours beginning, May 9, 2016, at 11:00 AM and ending May 9, 2016, at 7:00 pm for the medical test.

**CERTIFICATE OF CONFERENCE**

Undersigned Counsel has conferred with Assistant United States Attorney Tracy Thompson and Ms. Thompson is unopposed to this Motion.

WHEREFORE, PREMISES CONSIDERED, Defendant, MARK ANTHONY GRIMES, respectfully requests this Honorable Court to grant this Motion to Temporarily Modify Conditions of Pretrial Release, and for such other and further relief as this Honorable Court deems just and proper.

Respectfully submitted,

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BY: /s/ Kerrisa Chelkowski  
KERRISA CHELKOWSKI  
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BY: /s/ Sam Lock  
SAM LOCK  
STATE BAR NO: 24000470

ATTORNEYS FOR DEFENDANT:  
MARK ANTHONY GRIMES

**CERTIFICATE OF SERVICE**

We do hereby certify that a true and correct copy of the foregoing Motion to Temporarily Modify Conditions of Pretrial Release was electronically filed with the Clerk of this Honorable Court using the CM/ECF system which will send notification electronically to the United States' Attorney's Office.

SIGNED on this the 6<sup>th</sup> day of May, 2016.

BY: /S/ Sam Lock  
SAM LOCK

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**ORDER**

On this date came on to be considered Defendant Motion to Temporarily Modify  
Conditions of Pretrial Release, and said Motion is hereby:    GRANTED                    DENIED

Signed on this the \_\_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE